APPENDIX C

COMMENTS RECEIVED ON THIS ENVIRONMENTAL ASSESSMENT

A proposed finding of no significant impact on the Fuel Materials Facility was published in the Federal Register on May 19, 1982. Only one letter commenting on the Environmental Assessment was postmarked and received during the 30 day public comment period. This comment letter from the U. S. Department of Labor is reproduced below along with the letter to the Department of Labor responding to their comments.

U.S. Department of Labor

Occupational Safety and Health Administration
Washington, D.C. 20210

Reply to the Attention of:

JUN 9 1982

Mr. R. P. Whitfield
Director
Fuel Materials Facility
Project Office
Department of Energy
Savannah River Operations Office
P. O. Box A
Aiken, South Carolina 29801

Dear Mr. Whitfield:

I am writing in response to your Environmental Assessment and Finding of No Significant Impact for the proposed construction and operation of a Naval Reactor Fuel Materials Facility (FMF) at the Savannah River Plant (SRP) near Aiken, South Carolina. Overall, the assessment comprehensively covers and provides data on the environmental considerations required under NEPA and CEQ regulations. Upon review of the assessment, I have these additional comments.

-1 First, you may want to consider the potential for, and provide a description of, any energy impacts that will occur once the FMF is operational.

-2 Second, under the operational effects section 5.2, the discussion on land use for solid wastes does not present any evidence or data to support the estimated 0.06 acre per year. Is this based on the amount of solid radioactive wastes discussed under section 5.2.5.1 on page 5-10? If so, this should be so indicated; if not, some data need to be presented showing how this land use estimate was determined.

-3 Third, in terms of the occupational exposures and controls discussed under section 5.2.5.2, p. 5-12, it would be useful to indicate the methodology used to arrive at the conclusions presented in these paragraphs. Appendix B, for example, presents the radiological impact analysis methods used to determine certain general and individual exposures to the public. It might be helpful to include in this appendix an explanation of the types of occupational exposures that were experienced by employees at the SRP since 1965 and which verify your projected exposure levels for the FMF. For example, such information might include any distinctions made between whole body exposures compared to hand, foot, or skin exposures; the duration of the exposures, including 8-hour TWA, quarterly, or annual exposures; the age of the employees and their number of years at the plant; or accumulative exposure data for long-term employees.

-3 (contd)

Fourth and last, it would also be helpful to discuss the procedures and work practices used to reduce worker exposures. No detailed information is provided in the report on the "approved" procedures that are mentioned in section 5.2.5.2, p. 5-12. Such information might list protective clothing, monitoring equipment, medical surveillance, recordkeeping, safety procedures and tests, emergency procedures, as well as labels, signs, and warning signals.

Thank you for the opportunity to review and comment on the assessment.

Sincerely,

Anne Crown Cyr
NEPA Liaison
Office of Regulatory
Analysis

Department of Energy
Savannah River Operations Office
P.O. Box A
Aiken, South Carolina 29801

July 2, 1982

Ms. Anne Crown Cyr
NEPA Liaison
Office of Regulatory Analysis
U. S. Department of Labor
Occupational Safety and Health
Administration
Washington, DC 20210

Dear Ms. Cyr:

Your letter to me dated June 9, 1982, included comments on the Environmental Assessment, Fuel Materials Facility (DOE/EA 0170).

We have reviewed the comments and our responses are enclosed. Comments received on the Environmental Assessment and responses prepared by us will be used by DOE Headquarters in making a final determination whether or not an environmental impact statement (EIS) is needed for the proposed action.

Sincerely,

R. P. Whitfield, Director
Fuel Materials Facility
Project Office

PF:JGF:cb

Enclosure

RESPONSES

A-1 Power needs for the FMF are small and will be satisfied by connecting to existing SRP sources. The use of existing services eliminate the need for new power facilities or transmission lines. Currently, the annual SRP consumption of electricity is about 1,270 Gw-hr of electricity, compared to an annual consumption of 1.75×10^{-2} GW-hr for the FMF. The energy impacts from the FMF operation will be insignificant when compared to other SRP operations and therefore were not addressed in the Environmental Assessment.

A-2 An estimated 25,000 ft^3 of solid waste is expected to be buried each year as a result of the operation of the FMF. Based on present burial practices for low-level beta-gamma waste, this volume of waste will utilize 140 linear feet of trench 20 feet wide or 0.06 acres per year.

A-3 The occupational dose estimate of 0.28 rem per year is based on overall occupational doses experienced at the Savannah River Plant (SRP). The dose estimate is the annual average whole body exposure per monitored employee for the last ten years of operation at SRP. It is our judgment that the FMF doses will be less than the SRP average since fission products will not be involved in operation of the FMF.

Extensive efforts are made to reduce work exposure to as low as reasonable achievable. When needed, these efforts include detailed planning of all work which involves radiation exposure potential to reduce exposure time, to provide adequate shielding and to preclude radionuclide assimilations. Such work is carried out under written procedures that are approved by all participating departments, including Health Physics. These procedures specify time limits for the work emergency regulations, safety considerations, protective clothing and equipment required. All workers exposed to radiation levels are required to wear thermoluminescent dosimeter (TLD) badges which are monitored by Health Physics on a routine basis. Records are maintained for all work with respect to personnel exposure, contamination, time required to complete the work and type of radiation. Depending on the radiation and contamination potential, the work may be continuously monitored by Health Physics. This group also conducts a whole body count and a bioassay program for all employees involved in radiation work.